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392

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- against -

GREGORY PAUL TIMEWELL, also known as "Blondie," "Blond John," "Charles Gardner," "Gregory Gardner," "Adrian David Greg," "New Zealand Greg," "Adrian David Hall," "David Adrian Hall," "John Harris," "Adrian Hopkins," "Joseph Adrian Brendon Hopkins," "Ronald David Hughes," "Paul Martin," "John Merrick," "Richard Joseph Mety," "Richard Metz," "J.P.," "Milton Jackson Parker," "Sam," "Michael Santos," "Chris Stevens," "Adrian Timewell" and "Gregory James Timewell," and STEPHEN ANTHONY MARC JOHNSON, also known as "Stephen Anthony," "Samuel Freedman," "Stephen V. Freedman," "David R. Freeman," "Steven Freeman," "Steven Anthony Gonsales," "Anthony Gonsalves," "Stephen Anthony Gonsalves," "Stephen Ray Gonsalves," "Steven Gonsalves," "Stephen V. Gonzales," "Steven Gonzalez," "Stephan Gonzalves," "Steven Gonzalves," "Marc Johnson," "Stephen Anthony Mark Johnson," "Moses," "Mo" and "Prophet,"

Defendants.

- - - - - X

THE GRAND JURY CHARGES:

I N D I C T M E N T

Cr. No. _____
(T. 21, U.S.C., §§ 841(a)(1), 841(b) (1)(A)(vii), 846 and 848(a), 853, 952(a), 960(a)(1), 960(b)(1) (G), and 963; T. 18, U.S.C., §§ 2 and 3551 et seq.)

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U.S. CLERK'S OFFICE
U.S. DISTRICT COURT, E.D.N.Y.
LONG ISLAND OFFICE

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V

COUNT ONE
(Continuing Criminal Enterprise)

1. In or about and between January 1981 and the date of this indictment, within the Eastern District of New York and elsewhere, the defendants GREGORY PAUL TIMEWELL, also known as "Blondie," "Blond John," "Charles Gardner," "Gregory Gardner," "Adrian David Greg," "New Zealand Greg," "Adrian David Hall," "David Adrian Hall," "John Harris," "Adrian Hopkins," "Joseph Adrian Brendon Hopkins," "Ronald David Hughes," "Paul Martin," "John Merrick," "Richard Joseph Mety," "Richard Metz," "J.P.," "Milton Jackson Parker," "Sam," "Michael Santos," "Chris Stevens," "Adrian Timewell," and "Gregory James Timewell" (hereinafter "GREGORY PAUL TIMEWELL"), and STEPHEN ANTHONY MARC JOHNSON, also known as "Stephen Anthony," "Samuel Freedman," "Stephen V. Freedman," "David R. Freeman," "Steven Freeman," "Steven Anthony Gonsales," "Anthony Gonsalves," "Stephen Anthony Gonsalves," "Stephen Ray Gonsalves," "Steven Gonsalves," "Stephen V. Gonzales," "Steven Gonzalez," "Stephan Gonzalves," "Steven Gonzalves," "Marc Johnson," "Stephen Anthony Mark Johnson," "Moses," "Mo" and "Prophet" (hereinafter MARC JOHNSON), and others did knowingly and intentionally engage in a continuing criminal enterprise in that they committed violations of Title 21, United States Code, Sections 841, 843(b), 846, 952, 959, 960 and 963, involving an amount in excess of one thousand kilograms of marijuana, which violations were part of a continuing series of violations of said statutes undertaken by the defendants

GREGORY PAUL TIMEWELL and MARC JOHNSON in concert with five or more persons with respect to whom the defendants GREGORY PAUL TIMEWELL and MARC JOHNSON occupied the position of organizer, supervisor and manager and from which continuing series of violations the defendants GREGORY PAUL TIMEWELL and MARC JOHNSON obtained substantial income and resources.

(Title 21, United States Code, Section 848(a); Title 18, United States Code, Sections 2 and 3551 et seq.).

COUNT TWO
(Conspiracy to Import)

2. In or about and between January 1993 and the date of this indictment, within the Eastern District of New York and elsewhere, the defendants GREGORY PAUL TIMEWELL and MARC JOHNSON and others did knowingly and intentionally conspire to import into the United States from a place outside thereof hashish, a preparation and mixture containing marijuana, and marijuana, Schedule I controlled substances, in violation of Section 952(a) of Title 21, United States Code.

(Title 21, United States Code, Sections 963, 960(a)(1) and 960(b)(1)(G); Title 18, United States Code, Sections 3551 et seq.).

COUNT THREE
(Conspiracy to Distribute and Possess with the Intent to Distribute)

3. In or about and between 1993 and the date of this indictment, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants

GREGORY PAUL TIMEWELL and MARC JOHNSON and others did knowingly and intentionally conspire to distribute and to possess with intent to distribute hashish, a preparation of marijuana, and marijuana, Schedule I controlled substances, in violation of Section 841(a)(1) of Title 21, United States Code.

(Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(a)(vii); Title 18, United States Code, Sections 3551 et seq.).

COUNT FOUR
(Forfeiture)

4. As a result of the foregoing offenses, Title 21, United States Code, Sections 841, 848 and 963, the defendants GREGORY PAUL TIMEWELL and MARC JOHNSON shall forfeit to the United States all property, real and personal, involved in the aforesaid offenses and all property traceable to such property, including but not limited to the following:

a. One Hundred Million Dollars (\$100,000,000.00) in United States currency and all interest and proceeds traceable thereto, which were received by the defendants as a result of the more particularly described offenses of the Indictment, in that such sum in aggregate is property which was involved in the aforestated offenses or is traceable to such property.

b. If any of the above-described forfeitable property, as a result of any act or omission of the defendant,

i. cannot be located upon the exercise of due diligence;

ii. has been transferred or sold to, or deposited with a third person;

iii. has been placed beyond the jurisdiction of the court;

iv. has been substantially diminished in value; or

v. has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853 to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 853(a), 853(p), 2 and 3551 et seq.).

A TRUE BILL



FOREPERSON

ZACHARY W. CARTER
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

BY: Michael Landaire
ACTING UNITED STATES ATTORNEY
PURSUANT TO 28 C.F.R. 0.131

UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK

CRIMINAL Division

THE UNITED STATES OF AMERICA

v.

GREGORY PAUL TIMEWELL, also known as "Blondie,"

Blond John, et al.,

Defendant(s)

INDICTMENT

(T. 21, U.S.C., §§ 841(a)(1), 841(b)(1)(A)
(vi), 846 and 848(a), 853, 952(a), 960(a)
(1), 960(b)(1)(G), and 963; T. 18, U.S.C.,
§ 2 and 3551 et seq.)

A true bill.

Foreman

Filed in open court this _____ day,

of A.D. 19____

Clerk

Bail, \$ _____

Burton T. Ryan, AUSA 516 228-3166